

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

Green Copper Holdings, LLC,
Debtor.

CASE NO.: 25-10088-T

Chapter 7

**OBJECTION TO TRUSTEE'S MOTION FOR ORDER AUTHORIZING BIDDING PROCEDURES
AND TERMINATION FEE**

AND NOTICE OF OPPORTUNITY FOR HEARING

COME NOW the undersigned parties:

- **Pictoria Studios USA, Inc.,**
- **Taktik Enterprises, Inc.,**
- **Mystic Enterprises, Inc.,**
- **Dale Douglas Takio and Katalin Nagy-Takio, JTWROS,**
- **Michael J. Moran and Erinne Moran, JTWROS, and**
- **Craig Brand and Adriana Soto, JTWROS**

(collectively, the "Objectors"), each a creditor and/or equity stakeholder of Copper Tree, Inc. and its subsidiaries including Green Copper Holdings, LLC (the "Debtor"), and hereby jointly file this **Objection** to the Trustee's Motion for Order Authorizing Bidding Procedures and Sale of the Price Tower (the "Motion") filed on March 14, 2025, and state as follows:

1. Introduction and Standing

1.1 The Objectors collectively hold **secured and unsecured claims** against Copper Tree, Inc. and its subsidiaries totaling more than **\$500,000**, including under contractual agreements entered into prior to the bankruptcy filing.

1.2 The Objectors also hold **equity interests** in Copper Tree, Inc., including non-dilutive preferred equity, and have a material and vested interest in the assets now subject to the proposed sale.

1.3 These parties were **not served timely** with notice of the Trustee's Motion, which was filed on March 14, 2025, but **not received until March 22, 2025**, in violation of their rights as creditors and stakeholders.

2. The Proposed Sale Is Based on a Fraudulent and Grossly Undervalued Agreement

2.1 The Trustee seeks to sell the Frank Lloyd Wright-designed Price Tower and its contents to McFarlin Building, LLC for **\$1.4 million**, pursuant to a stalking horse Asset Purchase Agreement (APA).

2.2 The Objectors object to the Motion on grounds that the APA is based on **fraudulent inducement and breaches of fiduciary duty** stemming from a series of bad-faith transfers by Copper Tree, Inc. in violation of **preservation notices** served in September 2023

2.3 The Objectors possess a **professional third-party appraisal** conducted in April 2023 that values the Price Tower at over **\$40 million**, which will be submitted **under seal** or presented at a hearing.

3. The Sale Fails to Maximize Estate Value in Violation of 11 U.S.C. § 363

3.1 Under 11 U.S.C. § 363 and § 704, the Trustee is required to **maximize value** for the benefit of all creditors.

3.2 A sale for \$1.4 million—less than **4% of known appraised value**—especially when coupled with a **Termination Fee** of \$70,286, is a violation of that duty and constitutes a de facto gift to the stalking horse bidder.

3.3 The Motion fails to disclose or address the Objectors' **prior legal claims, valuation evidence**, or the impact on **non-consenting equity holders**, which raises serious questions of fairness and compliance.

4. Due Process and Notice Failures

4.1 The Objectors served **pre-litigation preservation notices** on Copper Tree Inc. and related parties in **September 2023**, warning against asset transfers, sales, or encumbrances of disputed property without appropriate legal resolution.

4.2 The Motion ignores these notices and acts as if no contest or lien exists, constituting a **violation of due process** and potentially bankruptcy fraud under **18 U.S.C. § 152**.

4.3 No effort has been made to consolidate or resolve competing ownership or creditor claims despite formal notice and recorded evidence.

5. Relief Requested

WHEREFORE, the undersigned Objectors respectfully request that the Court:

- **DENY** the Trustee's Motion for Order Authorizing Bidding Procedures and Sale to McFarlin Building, LLC;
- Or in the alternative, **APPOINT a neutral examiner or appraiser** to assess the fair market value of the Price Tower and associated assets;
- **SCHEDULE a hearing** with proper notice to all known creditors, stakeholders, lienholders, and preservation notice filers;
- **PERMIT the Objectors to present their appraisal, claim documents, and legal arguments under seal or at the hearing;**
- And **GRANT** such other and further relief as this Court deems just and proper.

Respectfully submitted,


Pictoria Studios USA, Inc.

By: 
Michael J. Moran, President

Taktik Enterprises, Inc.

By: 
Dale Douglas Takio, President

Mystic Enterprises, Inc.

By: 
Craig A. Brand, CEO

Dale Douglas Takio and Katalin Nagy-Takio, JTWROS



Michael J. Moran and Erinne Moran, JTWROS



Craig Brand and Adriana Soto, JTWROS



Dated: March 22, 2025

Contact: mike@pictoriastudios.com | (407) 906-6299